Michael Ritorto

From: Sue Berube [mailto:subarube@hotmail.com]
Sent: October-12-15 7:54 PM
To: Stroiazzo, John (Toronto - CA) <John.Stroiazzo@glencore-ca.com>; cirian.mike@epa.gov; Sue Berube <subarube@hotmail.com>
Subject: Addition to 10/09/15 Walking Tour of CFAC

John,
Again, thank you for allowing me to tour the plantsite with you and the two Mike's and Steve last Friday. I enjoyed the morning and I hope you all have a more detailed understanding of the issues at CFAC. I reviewed my notes after I got home that afternoon and there are a couple items I would like to see added to the minutes you guys are writing up. We were going so fast from site to site to get you guys to your planes at 1:00 pm that I missed a couple things.
First, PCB contaminated oils were used for dust suppression on all the roads north of the plant as well as the mixed waste landfill cap. CFAC tried to segregate the greater than 50ppm drums starting in the 1980's but we were not totally effective. At least a quarter mile of county road north of Glacier International Airport was dug up and rebuilt after it was determined that oil sold by the plant to a private individual was used for dust suppression in front of his property. The oil was above the hazardous 50ppm threshold. In the 60's 70's and 80's we generated so much of this oil we couldn't get rid of it fast enough so it went on the roads and was sold to private companies and individuals for their private use(dust suppression generally). We also had a waste oil incinerator installed in the 90's to burn as much as possible in a location just north of the maintenance building. Many barrels of oil that contained PCB as well as all the other liquid pollutants generated on site were put back in 55 gallon drums and they found their way into at least 2 of the 4 landfills on the CFAC site.
The next area I would like added to the notes concerns the 11 acre mixed waste landfill and the adjacent sludge pond. Don's lack of recollection, while not surprising at his age, is concerning to me however since there were 3 of us who personally witnessed standing water in the test holes I had to dig for Hydrometrics. In addition Don and the then plant manager received a very detailed memo from me listing what we witnessed and some very specific recommendations and predictions about the effectiveness of a cap on this site.
Here is more on this cap for the mixed waste landfill.
In the spring of 1994 Sandy Stash(Arco's Butte based Environmental Manager) with a team of ARCO lawyers and engineers flew into the plant by helicopter to review the Hydrometrics design plans and physically walk the site to be capped before ARCO would approve the funding for the project. I participated in this event and ended up walking with a much older and slower gentleman way at the back of the tour group. When he introduced himself to me I immediately recognized him as the Anaconda engineer who signed off on many of the original hand drawn AA, AB etc. prints from the early to mid 1950's. I immediately changed the discussion to one of "how did we get such a mess up on this dump/sludge pond site" and he told me this story. The area we were standing on was used during the initial 1950's construction of the Anaconda plant as a gravel source for their cement plant. The area had been mined to a depth 10 to 20 feet below the now current natural grade in the area. One spring morning they came in to work and found all of the equipment in the gravel pit sitting in 3 feet of water. They were forced to source gravel and crush in another area of the plant property. The water eventually filled the pit with 15 feet or more of water depth. At a later date when the water receeded and disappeared from the pit this hole became a natural spot for dumping construction wastes and eventually operating wastes from the plant once it started operation in 1955. This area gathered liquid from the wet scrubbers used to scrub the off gases from the potlines in the sludge pond area as well as

the operation wastes from the plant up until 1980.
A further bit of information is that every pond and lake along the west slope of the Swan and Mission mountain ranges in the north end of the Flathead Valley receive a large amount of their total water input from directly underground. Many bodies of water have no inlet or visible outlet streams yet they can move up 15 to 20 feet in depth during the spring and summer seasons. Please research the following local ponds and lakes to coroberate what I just wrote about. In particular look at cedar lake, lakes Blaine and Echo, the entire many lakes complex and the private ponds located just across highway #2 from the plants south boundary on the Orem family farm. The 1993 study by Hydrometrics to justify the cap went to great lengths and used multiple computer simulations to show how the cap would stop all rain and snow melt from going thru the waste in these dump sites, while completely avoiding any serious consideration of an underground water source entering the waste.
In helping secure the permit from the State Water Board to build the cap both Hydrometrics and CFAC management asserted that test well 17 (TW17) would be the indicator to watch. The State was told TW17 would drop from its then high cyanide and fluoride contaminant levels to those associated with wells on the far south side of the plant in 3 to 5 years based on computer simulations. From my point of view the simulations were fairly accurate if you look at the flow of leachate from the engineered landfill from 1989 when it was capped until 1994 when this leachate pond liner was breached and filled with gravel. Unfortunately it didn't work out this way at the mixed waste landfill as TW17 is virtually at the same high contamination levels in 2014 as it was in 1994 when the cap was placed. This was my assertion to Don and the plant manager in the letter I wrote 21 years ago. The cap wouldn't work because water is entering the dump and sludge pond area from below and not as rain and snow.
I feel information on the PCB's and underground water source are very important to your future investigation plans.
The hurried nature of our tour as we got to the north end of the plant prevented me from discussing these issues properly.
Again, thank you for taking time out of your busy schedules to listen to what I had to say. I hope they help you do a one time only study that results in concrete actions to not only put the plant property back in good shape; but helps protect your neighbors and the local animal populations from the effects of the chemicals that have been released at this site.

Sincerely,\

Nino Berube